

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Javier Olmedo, on behalf of himself and all  
other employees similarly situated, Plaintiff  
v.  
Zaza Pas, Inc. and Conceta Donati,  
individually, Defendants.

Case No. 15-cv-3184  
Judge Rowland

**JOINT STIPULATION TO DISMISS**

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above  
entitled action, by their respective attorneys and/or otherwise, and pursuant to Fed. R. Civ. P.  
41(a)(1), the following:

1. On November 17, 2015, the parties reached a settlement of the above-captioned action  
through a settlement conference.
2. The parties' settlement provides for a series of installment payments to be made by  
Defendants, with the final installment payment due on or before November 15, 2016.
3. The parties therefore stipulate that this matter shall be dismissed in its entirety, **without  
prejudice**, with each party incurring its own attorneys' fees and costs, except as otherwise  
provided for by the parties' settlement agreement.
4. On November 30, 2016, absent a motion by either party to enforce the settlement  
agreement, the dismissal of this matter shall convert automatically to a dismissal with prejudice.

Respectfully submitted,

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